



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue
Seattle, WA 98101

ORD 7398

11-16-99

Sf

November 16, 1999

Reply To
Attn Of: WCM-126

Chuck Clinton, Manager
Northwest Region
Oregon Department of Environmental Quality
2020 SW 4th Avenue Suite 400
Portland, Oregon 97201-4987

RE: RCRA Compliance Inspection Report for Van Waters and Rogers -
Portland, Oregon. ORD 00922 7398.

Dear Mr. Clinton:

Enclosed is a copy of EPA's RCRA compliance report for the
Van waters and Rogers Portland, Oregon facility. This copy is
being provided to you as a courtesy and EPA does not expect any
formal enforcement as no violations were noted. If you or your
staffs have any questions, please contact Bruce Long of my staff
at (503) 326-3686.

Sincerely,

Kimberly A. Ogle for
Jamie Sikorski, Manager
RCRA Compliance

Enclosure

FILE COPY

USEPA RCRA



3019451



Printed on Recycled Paper

bcc: Mike Slater, 000
 June Alexander, WCM-126
 Bruce Long, 000

CONCURRENCES				POLICY FILE	
Initials:	BL	Done	<i>[Signature]</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Name:	Bruce Long	RCU Peer	Jamie Sikorski	If policy file please bcc to RMSPU Manager	
Date:	11/11/99	11/14/99	11/16		
RCRIS EVENT			Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
SNC IDENTIFICATION			Yes <input type="checkbox"/>	No <input type="checkbox"/>	
(Can it be entered in RCRIS?)			Yes <input type="checkbox"/>	No <input type="checkbox"/>	
SBREFA INFO VERIFICATION			Yes <input type="checkbox"/>	No <input type="checkbox"/>	
PEER REVIEW			Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	
REGION 9 POLICY FILE			Yes <input type="checkbox"/>	No <input type="checkbox"/>	

RCRA Narrative Report

Van Waters & Rogers
3950 NW Yeon Avenue
P.O. Box 10287
Portland, Oregon 97210

Date of Inspection: September 24, 1999

Date of Report: September 24, 1999

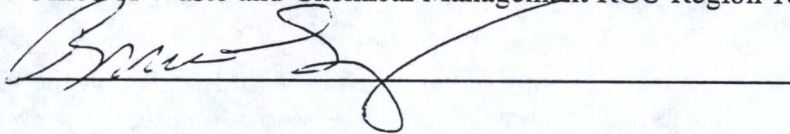
EPA Identification Number: ORD 00922 7398

Facility Contacts:

Operations Manager: Mark S. Rogers
Chemcare Coordinator: Jerry Jones
Telephone Number: 503-222-6233

Inspection Team: Bruce Long, Investigator

Report Prepared By: Office of Waste and Chemical Management RCU Region 10



Authority/Purpose

The United States Environmental Protection Agency (EPA) intended to secure information regarding Van Waters & Rogers compliance with the regulations promulgated under the Resource Conservation and Recovery Act (RCRA) and its amendments, the Hazardous and Solid Waste Amendments of 1984 (HSWA). Specifically, regulations found at 40 CFR Part 260 through 270 and 279 for the management, transportation, treatment, and disposal of hazardous waste and used oil as defined under these regulations.

The Oregon Department of Environmental Quality has been delegated the authority to enforce state rules in lieu of the federal regulations. These rules are found at Chapter 340, Division 100 through 108. EPA holds the responsibility to carry out the enforcement of the RCRA and HSWA regulations under Section 3008.

This inspection was carried out under the authority of Section 3007 of RCRA. This inspection was selected as part of EPA's oversight inspection scheme. At the time of this inspection, Van Waters & Rogers had not achieved final closure on the regulated unit. This unit was a landfill resulting from the release of spent solvents from a solvent recycling operation. However, at this time, Van Waters & Rogers is under a 3088(h) Order which subject Van Waters & Rogers to carry out corrective actions to clean up the release of spent solvents. Van Waters & Rogers was inspected for compliance with the large quantity generator (LQG) regulations.

Facility Description:

Van Waters & Rogers is a chemical processor and distributor. In addition, Van Waters & Rogers import chemicals for distribution in commerce of the United States. Chemicals are stored in tanks and containers. Van Waters & Rogers blends chemicals for specific customer orders. Van Waters & Roger does not manufacture new chemicals at the Portland facility.

In the mid 1970s through the mid-1980s, Van Waters & Rogers operated a solvent reclamation unit and were subject to RCRA 3005 reporting requirements. Van Waters & Rogers submitted a Part A application in November 1980 and requested to withdraw its Part A application in 1986. In the mid-1980s Van Waters & Rogers and EPA entered in to a consent agreement under Section 3008(h) of RCRA.

Introduction/Inspection Findings:

On September 24, 1999, at approximately 10:00 a.m. I arrived at the facility and met with Mark S. Rogers, Operations Manager and Jerry Jones, Chemcare Coordinator. After introductions, I presented my credentials and identified the purpose and authority for this inspection.

The following is a summary of my findings during this inspection.

Contingency Plan/Up-dates and Review (40 CFR 265 Subpart D):

I reviewed the contingency plan during this inspection. The following is a summary of my review. The contingency plan was last revised on September 15, 1998, when Van Waters & Rogers up-dated its Emergency Coordinators. At this time, Mark Rogers, Russ Palmer, and Ron Von Drew were listed as the Emergency Coordinators. According to Mr. Rogers, Van Waters & Rogers have not had to implement the contingency plan within the last three years. Foss Environmental acts as Van Waters & Rogers response team when an emergency does exist.

Attachment I is a map that shows the location of all emergency equipment boxes. Equipment listed in the plan was compared with the items found in the storage boxes. All equipment listed was found in each of the storage boxes.

A copy of the revised plan was delivered to ODEQ and the local fire department on September 15, 1998.

Training Records (40 CFR §265.16):

Training records were reviewed for all personnel at the Portland Van Waters & Rogers facility. Emergency coordinators, Mark Rogers, Russ Palmer, and Ron Von Drew were given annual refresher training in October 1998. Jerry Jones had his training in April 1998. Jerry is the manager of hazardous waste storage and shipping. Training records show all personnel participate in the annual contingency plan training.

Other training included hazardous waste management activities such as drum labeling and inspection of storage units.

Satellite Accumulation Areas (40 CFR 262.34(c)(1)):

At the time of this inspection, Van Waters & Rogers have two satellite accumulation points. The first was found near the vapor extraction system (south end of facility, see map in Attachment I). There was no waste in the container seen in Photograph number 1. The batch records are contained in side the over pack container and no wastes have been add or removed from the container since May 28, 1999.

A second satellite accumulation point is located on the north west door. Here, there are four containers of hazardous waste. Waste streams are segregated by solvents or mixtures. In Photograph number 2, the four containers (looking right to left) contain the following;

- 1) Chlorinated Solvents, first batch was add to the container on April 23, 1999, and contained approximately 5 pounds of spent solvents.
- 2) Glycol Mixtures, first batch was added on August 10, 1999, and the last batch was added on September 21, 1999. The approximate weight of spent glycol in the container was 398 pounds.
- 3) Amine mixtures. This container was currently empty.
- 4) Debris. This container is used to collect rags, floor dry and other debris. This container was also empty at the time of the inspection.

The source of the waste is the result of loading and unloading chemical on the dock. If spills occur or small amounts of chemicals are contaminated because of handling, there are placed in one of the four containers. No other waste is generated at this facility. All containers were in good condition and stored in an over pack. Each over pack and container was labeled with the words "hazardous waste" and the type of waste stored in the container. Batch records are maintained for each container.

90-day Accumulations Area (40 CFR 262.34 as applicable):

At the time of this inspection there were 17 55-gallon containers accumulated in the 90-day area (Photograph number 3). Each container was in good condition, all were closed, no leaking was observed, and the containers were clearly marked with the date accumulation began and with the words "hazardous waste." The oldest accumulation date was August 7, 1999 and the rest were dated August 12, 1999.

Inspections of this area are performed weekly. No discrepancies were noted in the inspection log.

Subparts AA, BB, and CC are not applicable to this facility.

10-day Transfer Area (40 CFR 263 Subparts A & B):

Van Waters & Rogers also operate as a 10-day transfer facility. At the time of this inspection there was not any waste stored in the 10-day transfer area (located next to the vapor extraction system (see map in Attachment I). Transported manifests were reviewed and no discrepancies were noted. All transferred hazardous waste was stored less than 10-days, each manifest had the signature of the transporter.

Manifest Review (40 CFR 262.40 & 262 Subpart B):

This facility was last inspected by ODEQ in 1997. I reviewed all manifest for off-site disposal covering the period of time from January 1, 1998 to present. Only one discrepancy was found. Manifest number 99001, dated 01/27/99, Van Waters & Rogers did not have a copy of the generators manifest with a signature of the designated facility. However, a faxed copy of the manifest with the designated facility's signature was obtained from Pollution Controls Industries (the designated facility) during the inspection (Attachment II).

Each manifest reviewed during this inspection had an LDR notice and certificates of disposal. No discrepancies were found.

Record Keeping:

I reviewed the states annual reports. Van Waters & Rogers had annual reports from the periods ending December 1995 through December 1998.

Exports/Imports:

At the time of this inspection, Van Waters & Rogers was not importing or exporting hazardous waste for disposal or recycling.

Status on Corrective Action:

At the time of this inspection, VW and R had acquired a NPDES permit for the discharge of waste waters from the vapor extraction system. However, the pipping between the wells and the extraction system have not been constructed.

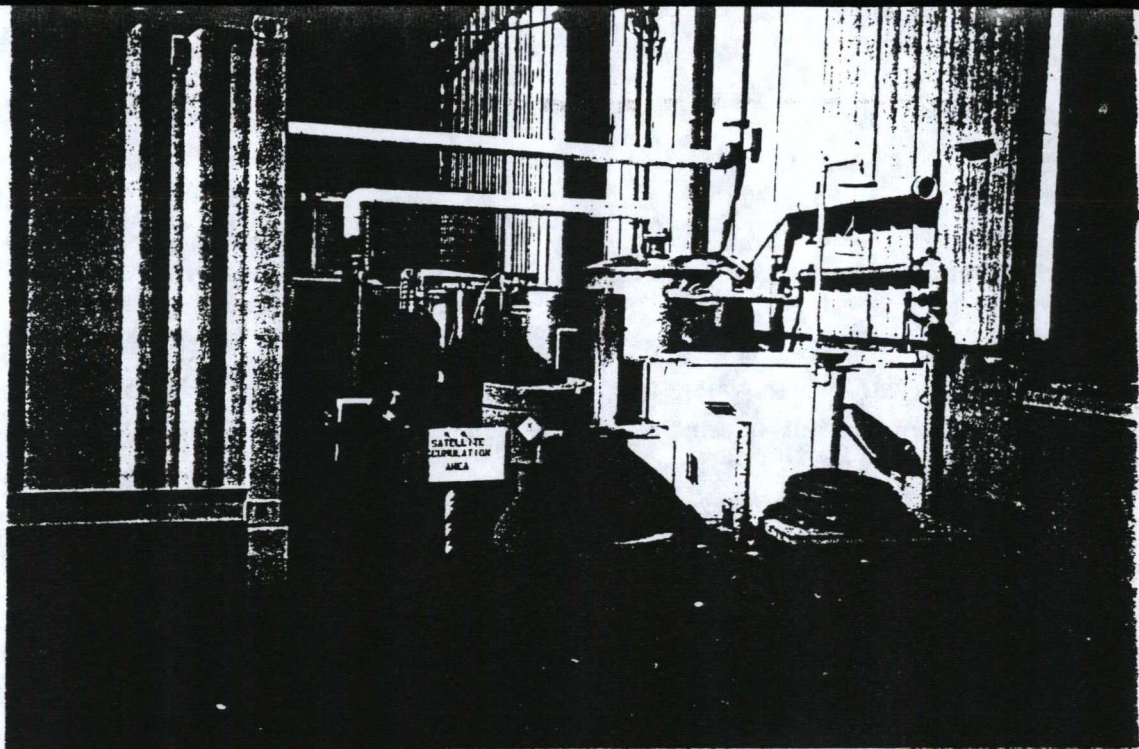
Waste Determination Documents:

Waste determinations are based on process knowledge and batch records for each of the accumulation drums. No discrepancies were noted during this inspection.

Closing Conference:

Representatives for Van Waters and Rogers were Mark S. Rogers, Operations Manager, and Jerry Jones, Chemcare Coordinator.

Once a copy of the manifest that did not have the designated facility's signature was obtained, there were no outstanding issues that required correcting.



Attachment I

Map of Van Waters and Rogers
Portland, Oregon

September 24, 1999

Attachment II

Van Waters and Rogers

Manifest Number 99001

January 27, 1999

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT
P.O. Box 7035
Indianapolis, IN 46207-7035

FEB 05 1999

PLEASE PRINT OR TYPE

ORDER # 121075

(Form designed for use on elite (12-pitch) typewriter.)

Form Approved: OMB No. 2050-0039. Expires 9-30-98

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's U.S. EPA ID Number
02000922739

2. Page 1 of 1
Information in the shaded areas is not required by Federal Law, but Items D, F, H, I and K are required by State Law.

3. Generator's Name and Mailing Address

VAN WATERS & ROGERS INC.
3950 NW YEON AVE.
PO BOX 10287, PORTLAND, OR 97210

A. State Manifest Document Number

INA1361371

4. Generator's Telephone Number (503 222-1721

B. State Generator's ID

5. Transporter 1 Company Name

TRI-STATE MOTOR TRANSIT

C. State Transporter's ID

7. Transporter 2 Company Name

D. Transporter's Phone

800-234-8768

8. Designated Facility Name and Site Address

POLLUTION CONTROL INDUSTRIES
4343 KENNEDY AVENUE
EAST CHICAGO, IN 46312

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

219-397-3951

11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

13. Total Quantity

14. Unit Wt/Vol

1. Waste No.

a. RQ, WASTE FLAMMABLE LIQUID, N.O.S.
(ETHYL ALCOHOL, SODIUM LAURAL SULFATE)
3, UN1993, PG II, (RQ-100), (EPA D001), (ERG 128)

No. Type

Quantity

Unit Wt/Vol

Waste No.

001 DM 00450 P

001 DM 00435 P

002 DM 00888 P

D001

b. WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCES,
LIQUID, N.O.S. (ETHYLENE GLYCOL, DIOCTYLPHTHALATE)
9, UN3082, PG III, (EPA U107 U359), (ERG 171)

U107

c. RQ, HAZARDOUS WASTE, LIQUID, N.O.S.
(WATER, TRICHLOROETHENE)
9, NA3082, PG III, (RQ-100), (EPA D040 D029 D043
U226 U227 U076 U078 U077 U083), (ERG 171)

D040

X 4019, 4225, 4079, 4210, 4220, 4084, 4228,
4121, 4042, 4239, 4044, 4080

J. Additional Descriptions for Materials Listed Above

11a. PCI98110329LT

BIOTERG 804

11b. PCI5058071W

GLYCOL RINSE (U359)

11c. PCI508387

CONTAMINATED WATER (MULTI COUED)

K. Handling Codes for Wastes Listed Above

501

15. Special Handling Instructions and Additional Information

EMERGENCY CONTACT: CHEMTREC: 1-800-424-9300. CALLER MUST IDENTIFY VAN WATERS & ROGERS AS SHIPPER.

CERTIFICATE OF DESTRUCTION REQUIRED

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

RICHARD HITZMAN

Richard Hitzman

Month Day Year
01 27 99

17. Transporter 1 - Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Curtis Williams

Curtis Williams

Month Day Year
01 27 99

18. Transporter 2 - Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year
01 27 99

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest (except as noted in item 19)

Printed/Typed Name

Signature

Arthur Bishop

Arthur Bishop

Month Day Year
01 28 99

INA1361371